

RECEIVED

AUG 30 2017

CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTA

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Plaintiff(s),

vs. DANIEL DONAHUE

Case No. 17cv 4061 JNE/HB
(To be assigned by Clerk of District Court)

+
Dakota County Minnesota County Attorneys
Dakota County Minnesota USA, and,
The City of Inner Grove Heights, AND
ISA, AND INNER GROVE HEIGHTS
Police Department, The League of
Minnesota Cities.
Defendant(s).

DEMAND FOR JURY TRIAL
YES ☒ NO ☐

(Enter the full name(s) of ALL defendants in this lawsuit. Please attach additional sheets if necessary).

COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff *Daniel Donahue*

Name *Daniel Donahue*

Street Address *435 University Ave E. #112*

County, City *Ramsey County. Saint Paul*

State & Zip Code *Minnesota 55130*

Telephone Number

SCANNED

AUG 31 2017

U.S. DISTRICT COURT ST. PAUL

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1 ~~DAKOTA County~~

Name ~~DAKOTA County~~, DAKOTA COUNTY DISTRICT ATTORNEYS OFFICE
STAFF and Employees
of DAKOTA County MN
USA

Street Address 1560 Highway 55

County, City Hastings, MN 55033

State & Zip Code DAKOTA County

b. Defendant No. 2 CITY OF INNER GROVE HEIGHTS MINNESOTA - AS

Name INNER GROVE HEIGHTS POLICE DEPARTMENT

Street Address 8150 BARBARA AVE. E

County, City INNER GROVE HEIGHTS, MN 55077

State & Zip Code DAKOTA County

c. Defendant No. 3 League of Minnesota Cities

Name League of Minnesota Cities

Street Address 145 University Ave, W, St Paul, MN

County, City Ramsey, MN Saint Paul

State & Zip Code

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal Question

☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name:

State of Citizenship:

Defendant No. 1:

State of Citizenship:

Defendant No. 2:

State of Citizenship:

Attach additional sheets of paper as necessary and label this information as paragraph 5.

Check here if additional sheets of paper are attached. ☐

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

☒ Defendant(s) reside in Minnesota

☒ Facts alleged below primarily occurred in Minnesota

☒ Other: explain

Minnesota agencies involved(s)

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

4th Amendment of US Constitution

7. 1) June 17th 2013 ~~ARRESTED~~ FALSELY w/o PROBABLE CAUSE, w/o Appropriate warrant, USING 3rd perhaps 5th party vendor verified information violating plaintiffs 4th Amendment, using non reliable marketed criminal history incorrect for plaintiffs Identity, accusing him of a crime computer forensic sciences proved not to be possible, also previously verified to law enforcement that plaintiff was indeed not the ^{ingrate} culprit, by financial institution personnel, Inver Grove Heights Police department personnel continued to, maliciously pursue and convert MR Domine into suspect #1
- (b) also re detaining MR Domine after the circuit court judge Mangatan releasing on own Recognissance 6/26/2013 approx 0300 hrs.
- 1) Defendants, cooperating in an involuntary commitment attempt @ regions hospital stating Plaintiff was suicidal, homicidal, using 2566 mimesota. Without cause. Nothing proven, no exculpatory effort on behalf of accused.
- also all alleged facts and allegations listed in initial Complaint.

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

as well as see attached

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

The original complaint asked for 6 million dollars vs before the next set of deprivations were discovered through the process, discovery and fact finding. The re-filing of that was denied, along with the rest of the due process and further rights protected under constitutional deprivations listed here. 10 million. US. Restraints under against Dakota County. Written apology.

Court.

1) Abuse of process

- Plaintiff (a) used process to deny plaintiff access to evidence, b) then used process to blame and penalize, sanction, plaintiff, deprive him of the Court process.

2) depriving plaintiff

1) Right to a trial US Constitution

2) Right to remedy for wrongs - MW Const.

3) Right to justice - MW Const.

4) Right to feel secure and safe 4th amendment

5) 14th amendment - due process (fair, complete)

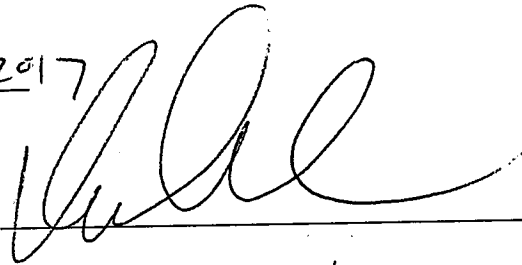
6) 5th amendment - deprived of life liberty without due process.

7) 6th amendment - never got to confront witnesses or provide witnesses, evidence in my favor

and any other additions to be submitted once discovered.

Signed this 30th day of August 2017

Signature of Plaintiff



Mailing Address 435 University Ave #112
SAINT PAUL, MN 55130

Telephone Number NO

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.